

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

CORLIS VERNON, individually and on behalf  
of all others similarly situated,

*Plaintiff,*

V.

CLOSETS BY DESIGN, INC. and CBD  
FRANCHISING, INC.,

### *Defendants.*

Case No. 2:23-cv-01180-JNW

**STIPULATED MOTION TO  
EXTEND CLASS CERTIFICATION  
BRIEFING SCHEDULE**

NOTE FOR MOTION CALENDAR:  
January 22, 2025

## STIPULATED MOTION

Pursuant to LCR 7(d)(1) and LCR (10)(g), Plaintiff Corlis Vernon (“Plaintiff”) and Defendants Closets by Design, Inc. and CBD Franchising, Inc. (“Defendants”), hereby submit this stipulated motion to extend the class certification briefing schedule set forth in the Court’s July 17, 2024, Minute Order (Dkt. 44). In support of this motion, the Parties state as follows:

WHEREAS, on November 15, 2023, Defendants filed their Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 27).

WHEREAS, on July 17, 2024, the Court issued a Minute Order setting forth the following deadlines regarding class certification (Dkt. 44):

<b>Event</b>	<b>Date</b>
Affirmative class certification expert disclosures	120 days after the Court's decision on the pending motion to dismiss

1	Rebuttal class certification expert disclosures	14 days after affirmative class
2		certification expert disclosures
3	Completion of depositions of class certification	28 days after rebuttal class certification
4	experts	expert disclosures
5	Deadline to file Motion for class certification	28 days after the deadline to complete
6		depositions of class certification
7		experts
8	Deadline to file Opposition to motion for class	28 days after motion for class
9	certification	certification
10	Deadline to file Reply to motion for class	28 days after reply to motion for class
11	certification	certification

12                   WHEREAS, on September 30, 2024, the Court issued its Order denying Defendant's Motion to  
 13 Dismiss (Dkt. 45). Pursuant to the Court's July 17, 2024, Minute Order (Dkt. 44), the current deadlines  
 14 for class certification are as follows:

15                   Event	16                   Date
Affirmative class certification expert disclosures	January 28, 2025
Rebuttal class certification expert disclosures	February 11, 2025
Completion of depositions of class certification	March 11, 2025
experts	
Deadline to file Motion for class certification	April 8, 2025
Deadline to file Opposition to motion for class	May 6, 2025
certification	
Deadline to file Reply to motion for class	June 3, 2025
certification	

26                   WHEREAS, the Parties have conferred and agree that, due to personal and professional  
 27 obligations, the Parties need additional time to fully consider and brief all relevant class certification

1 issues. Thus, the Parties respectfully propose that the deadlines for expert disclosures, class certification  
 2 briefing, and completion of depositions of class certification experts be modified as follows:

- 3 1. Affirmative class certification expert disclosures and reports shall be due no later than April  
   4 8, 2025;
- 5 2. Rebuttal class certification expert disclosures and reports shall be due no later than May 6,  
   6 2025;
- 7 3. Completion of depositions of Plaintiff's class certification experts shall be done by May 6,  
   8 2025;
- 9 4. Completion of depositions of Defendant's class certification experts shall be done June 3,  
   10 2025;
- 11 5. Plaintiff shall file a motion for class certification no later than June 10, 2025;
- 12 6. Defendants shall file an opposition to Plaintiff's class certification motion no later than July  
   13 22, 2025; and
- 14 7. Plaintiff shall file a reply to Defendant's opposition to Plaintiff's class certification motion  
   15 no later than August 26, 2025.

16  
 17 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES  
 18 that the schedule regarding class certification be modified as follows:

Event	Date
Affirmative class certification expert disclosures	April 8, 2025
Deadline to file Motion for class certification	June 10, 2025
Rebuttal class certification expert disclosures	May 6, 2025
Completion of depositions of Plaintiff's class certification experts	May 6, 2025
Deadline to file Opposition to motion for class certification	July 22, 2025
Completion of depositions of Defendant's class	June 3, 2025

1 certification experts

2 Deadline to file Reply to motion for class  
3 certification

August 26, 2025

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6 Dated: January 22, 2025

Respectfully submitted,

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3 *Counsel for Defendants*

4 \*Admitted *Pro Hac Vice*

5 **ORDER**

6 As described by the above Stipulated Motion, IT IS SO ORDERED.

7 1. Affirmative class certification expert disclosures and reports shall be due no later than April  
8 2025;  
9 2. Rebuttal class certification expert disclosures and reports shall be due no later than May 6,  
10 2025;  
11 3. Completion of depositions of Plaintiff's class certification experts shall be done by May 6,  
12 2025;  
13 4. Completion of depositions of Defendant's class certification experts shall be done by June 3,  
14 2025;  
15 5. Plaintiff shall file a motion for class certification no later than June 10, 2025;  
16 6. Defendants shall file an opposition to Plaintiff's class certification motion no later than July  
17 22, 2025; and  
18 7. Plaintiff shall file a reply to Defendant's opposition to Plaintiff's class certification motion  
19 no later than August 26, 2025.

20 This will be the last extension granted by the Court absent extraordinary circumstances.

21 Dated on this 29th day of January, 2025.

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24  
25 Jamal N. Whitehead  
26 United States District Judge  
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### Certificate of Compliance

I, Simon Franzini, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

By: /s/ Simon Franzini  
Simon C. Franzini